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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN – SOUTHERN DIVISION

JEAN ZAWLOCKI, GARY LONG,
MICHAEL VESPA, RICHARD
JOHNSON, DEBORAH KETCHNER,
JAMIE COLLIER, HERMAN GERJIARD,
PAUL RINKE, JAMES BEDWORTH,
GARY MULZER, DOUGLAS GENTRY,
JAMES SANDEEN, MEL PATTON,
DEREK HINES, JEFFREY VINSON,
RUSSELL ALLES III, EUGENE
HIRYNEWICH, and ENRIQUE SALDANA,
for themselves and as class representatives,

Plaintiffs,
vs.

Case No. 03-60159
Hon. Marianne O. Battani
Magistrate Judge Scheer

FILED
JAN 5 - 2005
CLERK OF COURT
U. S. DISTRICT COURT
EASTERN MICHIGAN

RAMA TECH, L.L.C., a Michigan limited
liability company, RAMA TECH, LLC
MEDICAL PLAN, RAMA TECH
INDUSTRIES, L.L.C., a Delaware limited
liability company, RAM THULURI, RANI
THULURI, and NUKO PRECISION, LLC, a
Michigan limited liability company, and
COMERICA BANK, a Michigan corporation

Defendants.

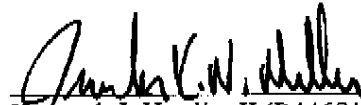
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STIPULATION AS TO THE FORM AND CONTENT
OF THE PROPOSED ORDER OF CLASS CERTIFICATION

The attached proposed Order of Class Certification (Exhibit 1), is hereby stipulated and agreed to, by and between the parties, as to form and content.



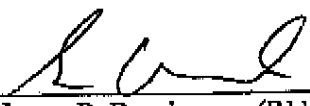
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CLERK'S OFFICE
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EASTERN MICHIGAN

ORDER OF CLASS
CERTIFICATION

ORDER OF CLASS CERTIFICATION

At a session of said Court, held in the U.S.
District Courthouse, City of Ann Arbor, County of
Washtenaw, State of Michigan, on December 7, 2004.

PRESENT: HONORABLE MARIANNE O. BATTANI

IT IS ORDERED, ADJUDGED, and DECREED that Plaintiffs' Motion for Class Certification is GRANTED as follows:

A. Pursuant to Fed.R.Civ.P. 23 (b), the Court certifies the following class, represented by Jean Zawlocki, Gary Long, Michael Vespa, Richard Johnson, Deborah Ketchner, Jamie Collier, Herman Gerhard, Paul Rinke, James Bedworth, Gary Mulzer, Douglas Gentry, James Sandeen, Mel Patton, Derck Hines, Jeffrey Vinson, Russell Alles III, Eugene Hrynewich, Enrique Sladana, Michael Babyak, Ron Pearson, J. Michael Sabatini and Larry Plantrich, on the issue of liability:

All employees of Rama Tech, L.L.C., who were participants in the Rama Tech LLC Medical Plan when they left Rama Tech L.L.C.'s employment and/or were employees at the time Rama Tech, L.L.C. ceased business operations, on or about December 19, 2002.

B. The members of the class shall be given notice via first class mail. The notice inter alia shall advise each member that (a) the Court will exclude the member from the class if the member so requests by a specified date; (b) the judgment will include and be binding upon and inure to the benefit of all members who do not request exclusion; and (c) any member who does not request exclusion may, if the member desires, enter an appearance through personal counsel. (See, Exhibit A- Notice)

C. Hardin & Associates, PC is hereby appointed class counsel under Rule 23(g).

So ORDERED, this the ___ day of December, 2004

JAN 5 - 2005

Marianne O. Battani
DISTRICT COURT JUDGE

Exhibit A

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN - SOUTHERN DIVISION

If you were an employee of Rama Tech, L.L.C., a class action lawsuit may affect your rights.

A court authorized this notice. This is not a solicitation from a lawyer.

- Former employees of Rama Tech, L.L.C. have sued Rama Tech, L.L.C.; Rama Tech, L.L.C. Medical Plan; Rama Tech Industries, L.L.C.; Ram Thuluri; Rani Thuluri; Nuko Precision, L.L.C.; and Comerica Bank, ("Defendants") alleging violations of the Employee Retirement Income Security Act of 1974, ("ERISA"), as amended, 29 U.S.C. §1001 *et seq.* and the Worker Adjustment and Retraining Notification Act ("WARN").
- The Court has allowed the lawsuit to be a class action on behalf of employees of Rama Tech, L.L.C., who were participants in the Ram Tech LLC Medical Plan when the left Rama Tech L.L.C.'s employment and/or were employees at the time Rama Tech, L.L.C., ceased business operations, on or about December 19, 2002.
- The Court has not decided whether anything wrong occurred. There is no money available now, and no guarantee there will be. However, your legal rights are affected, and you have a choice to make now:

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
DO NOTHING	<p>Stay in this lawsuit. Await the outcome. Give up certain rights.</p> <p>By doing nothing, you keep the possibility of getting money or benefits that may come from a trial or a settlement. But, you give up any rights to sue the Defendants in this matter separately about the same legal claims in this lawsuit.</p>
ASK TO BE EXCLUDED	<p>Get out of this lawsuit. Get no benefits from it. Keep rights.</p> <p>If you ask to be excluded and money or benefits are later awarded, you won't share in those. But, you keep any rights to sue Defendants separately about the same legal claims in this lawsuit.</p>

- Your options are explained in this notice. To ask to be excluded, you must act before February 1, 2005.
- Lawyers must prove the claims against Defendants at a trial. If money or benefits are obtained from Defendants, you will be notified about how to ask for a share.

WHAT THIS NOTICE CONTAINS

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BASIC INFORMATION

1. Why did I get this notice?

Rama Tech L.L.C.'s records show that you worked for Rama Tech L.L.C at the time Rama Tech, L.L.C. ceased business operations on or about December 19, 2002. This notice explains that the Court has allowed, or "certified", a class action lawsuit that may affect you. You have legal rights and options that you may exercise before the Court holds a trial. The trial is to decide whether the claims being made against the Defendants, on your behalf, are correct. Judge Marianne O. Batanni of the United States District Court for the Eastern District of Michigan-Southern Division is overseeing this class action. The lawsuit is known as Zawlocki, et al., v. Rama Tech L.L.C., et al, Civil Action No. 03-60159.

2. What is this lawsuit about?

This lawsuit is about whether Defendants violated the Employee Retirement Income Security Act of 1974, ("ERISA"), as amended, 29 U.S.C. §1001 *et seq.*, and the Worker Adjustment and Retraining Notification Act ("WARN") during the period prior to and including the closing of Rama Tech L.L.C.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called "Class Representatives" (in this case Jean Zawlocki, Gary Long, Michael Vespa, Richard Johnson, Deborah Ketchner, Jamie Collier, Herman Gerhard, Paul Rinke, James Bedworth, Gary Mulzer, Douglas Gentry, James Sandeen, Mel Patton, Derek Hines, Jeffrey Vinson, Russell Alles III, Eugene Hrynewich, and Enrique Saldana) sue on behalf of other people who have similar claims. The people together are a "Class" or "Class Members." The individuals who sued-and all the Class Members like them-are called Plaintiffs. Those who they sue are called Defendants. Once court resolves the issues for everyone in the Class-except for those people who choose to exclude themselves from the Class.

4. Why is this lawsuit a class action?

The Court decided from the bench at a hearing on December 7, 2004, that this lawsuit can be a class action and move towards a trial because it meets the requirements of Federal Rule of Civil Procedure 23, which governs class actions in federal courts. Specifically, the Court found that :

- There were approximately 200 employees employed by Rama Tech L.L.C. in December of 2002;
- There are legal questions of facts that are common to each of them;
- The Class Representatives claims are typical of the claims of the rest of the Class;
- The Class Representatives, and the lawyers representing the Class will fairly and adequately represent the class' interests;
- The common legal questions and facts are more important than questions that affect only individuals; and
- This class action will be more efficient than having many individual lawsuits.

WHO IS IN THE CLASS

You need to decide whether you are affected by this lawsuit.

5. Am I part of this Class?

Judge Marianne O. Battani decided that the Class Members are all employees of Rama Tech, L.L.C., who were participants in Rama Tech L.L.C. Medical Plan when they left Rama Tech L.L.C.'s employment and/or were employees at the time Rama Tech, L.L.C. ceased business operations, on or about December 19, 2002.

6. Are any workers who worked at Rama Tech L.L.C. not included in the class?

If you worked at Rama Tech, L.L.C., on or about December 19, 2002, but were not directly employed by Rama Tech, L.L.C., you are NOT a Class Member. Think about whether you were paid for your work at Rama Tech, L.L.C. by a temporary staffing service or an independent contractor for Rama Tech L.L.C. If so, you were not employed by Rama Tech L.L.C. In addition, if you were directly employed by Rama Tech, L.L.C., but left employment before December 19, 2002, and were not a participant in the Rama Tech L.L.C. Medical Plan you are also NOT a Class Member.

7. I'm still not sure if I am included.

If you are still not sure whether you are included, you can call or write to the lawyers in this case, at the phone number or address listed in question 17.

YOUR RIGHTS AND OPTIONS

You have to decide whether to stay in the Class or ask to be excluded before the trial, and you have to decide this now.

8. What happens if I do nothing at all?

You don't have to do anything now if you want to keep the possibility of getting money or benefits from this lawsuit. By doing nothing you are staying in the Class. If you stay in and the Plaintiffs obtain money or benefits, either as a result of the trial or a settlement, you will be notified about how to apply for a share (or how to ask to be excluded from any settlement). Keep in mind that if you do nothing now, regardless of whether the Plaintiffs win or lose, you will not be able to sue, or continue to sue, Defendants-as part of any other lawsuit-about the same legal claims that are subject of this lawsuit. You will also be legally bound by all of the Orders the Court issues and judgments the Court makes in this class action.

9. Why would I ask to be excluded?

If you exclude yourself from the Class-which also means to remove yourself from the Class, and is sometimes called "opting-out" of the Class-you won't get any money or benefits from this lawsuit even if the Plaintiffs obtain them as a result of the trial or from any settlement (that may or may not be reached) between Defendants and Plaintiffs. However, you may then be able to sue or continue to sue Defendants yourself. If you exclude yourself, you will not be legally bound by the Court's judgments in this class action.

If you start your own lawsuit against Defendants after you exclude yourself, you'll have to hire and pay your own lawyer for that lawsuit, and you'll have to prove your claims. If you do exclude yourself so you can start or continue your own lawsuit against Defendants, you should talk to your own lawyer soon, because your claims may be subject to a statute of limitations.

10. How do I ask the Court to exclude me from the Class?

To be excluded, you must send an "Exclusion Request" in the form of a letter sent by mail, stating that you want to be excluded from Zawlocki, et al., v. Rama Tech L.L.C., et al, Civil Action No. 03-60159. Be sure to include your name and address, and sign the letter. You must mail your Exclusion Request postmarked by February 1, 2005, to Hardin & Associates, P.C., Attn: Zawlocki, et al., v. Rama Tech L.L.C. Exclusions, 30150 Telegraph Road, Suite 345, Bingham Farms, Michigan 48025-4519.

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in this case?

The Court decided that the law firm of Hardin & Associates, P.C., are qualified to represent you and all class members and thus will be "Class Counsel". They are experienced in handling similar cases against other employers.

12. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you will have to pay that lawyer. For example, you can ask him or her to appear in Court for you if you want someone other than Class Counsel to speak for you.

13. How will the lawyers be paid?

If Class Counsel gets money benefits for the Class, they may ask the Court for fees and expenses. You won't have to pay these fees and expenses. If the Court grants Class Counsel's request, the fees and expenses would be either deducted from any money obtained for the Class or paid separately by Defendants.

GETTING MORE INFORMATION

14. Are more details available?

For more information, you may speak to Class Counsel by calling (248) 723-9900 and asking to speak to Barb or by writing to Hardin & Associates, P.C., 30150 Telegraph Road, Suite 345, Bingham Farms, Michigan 48025-4519.